

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Rosha Nicole Davis, Debtor**

**Case No. 23-02655-JAW  
CHAPTER 13**

**NOTICE**

Morgan and Morgan has filed papers with the court to be Employed as Special Counsel.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
Thad Cochran United States Courthouse  
501 E. Court St., Ste 2.300  
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date state above.

You must also mail a copy to Morgan & Morgan's attorney:

The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Application.

Date: April 10, 2025

Signature:

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
601-500-5533  
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Rosha Nicole Davis, Debtor**

**Case No. 23-02655-JAW  
CHAPTER 13**

**APPLICATION TO BE EMPLOYED AS SPECIAL COUNSEL**

COMES NOW, Morgan & Morgan (“Applicant”), by and through undersigned counsel, and pursuant to 11 U.S.C. §327(e) and F.R.B.P. 2014(a), files this Application to be Employed Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

1. That Morgan & Morgan represents that in the administration of the above referenced Debtors’ estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtor’s personal injury claim.
2. That the Applicant desires to be employed to render services in connection with the claim as Special Counsel for the Debtor.
3. That it would be in the best interests of the estate that said firm be employed.
4. An attorney for Morgan & Morgan has attached his affidavit hereto, stating that the firm is a disinterested party to Debtor’s estate. See Exhibit “A”.
5. That in consideration of said representation, Morgan & Morgan will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Morgan and Morgan as Special Counsel for the Debtor under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Morgan & Morgan, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767

Jackson, MS 39236

601-500-5533

[trollins@therollinsfirm.com](mailto:trollins@therollinsfirm.com)

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on April 10, 2025, to:

By USPS First Class Mail:

Rosha Nicole Davis  
5155 Thomas Rd  
Crystal Springs, MS 39509

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

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4                   **UNITED STATES BANKRUPTCY COURT**  
5                   **SOUTHERN DISTRICT OF MISSISSIPPI**

6                   IN RE:  
7                   Rosha Nicole Davis

8                   CASE NO: 23-02655  
9  
10                  **DECLARATION OF MAILING**  
11                 **CERTIFICATE OF SERVICE**  
12                 Chapter: 13

13 On 4/10/2025, I did cause a copy of the following documents, described below,

14                 Notice and Application to Employ Counsel  
15                 Exhibit A  
16                 Exhibit B

17  
18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with  
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and  
20 incorporated as if fully set forth herein.

21 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.  
22 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to  
23 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if  
fully set forth herein.

24 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been  
25 served electronically with the documents described herein per the ECF/PACER system.

26                 DATED: 4/10/2025

27                 /s/ Thomas C. Rollins, Jr.  
28                 Thomas C. Rollins, Jr.

29  
30                 The Rollins Law Firm  
31                 702 West Pine St  
32                 Hattiesburg, MS 39401  
33                 601 500 5533  
34                 trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPIIN RE:  
Rosha Nicole Davis

CASE NO: 23-02655

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 4/10/2025, a copy of the following documents, described below,

Notice and Application to Employ Counsel

Exhibit A

Exhibit B

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/10/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

ROSHA NICOLE DAVIS  
5155 THOMAS RD  
CRYSTAL SPRINGS MS 39509